

1 JONATHAN W. CARLSON, ESQ.
Nevada Bar No. 10536
2 *jcarlson@mbswc.com*
PAMELA L. MCGAHA, ESQ.
3 Nevada Bar No. 8181
pmcgaha@mbswc.com
4 MANDY VOGEL, ESQ.
Nevada Bar No. 16150
5 *mvogel@mbswc.com*
McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP
8337 West Sunset Road, Suite 350
7 Las Vegas, NV 89113
Telephone: (702) 949-1100
8 Facsimile: (702) 949-1101

9 CARY B. LERMAN, ESQ.
California Bar No. 54937 (*admitted pro hac vice*)
10 *cary.lerman@mto.com*
MUNGER, TOLLES & OLSON LLP
11 350 South Grand Ave, 50th Floor
Los Angeles, CA 90071
12 Telephone: (213) 683-9100

13 J. MAX ROSEN, ESQ.
California Bar No. 310789 (*admitted pro hac vice*)
14 *max.rosen@mto.com*
MUNGER, TOLLES & OLSON LLP
15 560 Mission Street, 27th Floor
San Francisco, CA 94105
16 Telephone: (415) 512-4000
Attorneys for Defendant GEICO CHOICE
17 INSURANCE COMPANY

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 WILLIE WORTHAMS, individually,

21 Plaintiff,

22 v.

23 GEICO CHOICE INSURANCE COMPANY,
a foreign entity; LEWIS BRISBOIS
24 BISGAARD & SMITH, LLP, a foreign
limited liability partnership; LEWIS ROCA
25 ROTHGERBER, CHRISTIE, LLP, a foreign
limited liability partnership; DOES I through
26 X, inclusive; and ROE CORPORATIONS I
through V, inclusive,

27 Defendants.
28

Case No. 2:24-cv-00023-JCM-NJK

**STIPULATION TO EXTEND TIME TO
FILE RESPONSES TO PLAINTIFF'S
MOTION FOR PROTECTIVE ORDER
[DOC. 91] AND MOTION TO COMPEL
[DOC. 92]**

[FIRST REQUEST]

Case No. 2:24-cv-00023-JCM-NJK

STIPULATION TO EXTEND TIME TO FILE RESPONSES TO PLAINTIFF'S MOTION FOR PROTECTIVE
ORDER [DOC. 91] AND MOTION TO COMPEL [DOC. 92]

[FIRST REQUEST]

Pursuant to LR IA 6-1, Plaintiff Willie Worthams and Defendant GEICO Choice Insurance Company ("GEICO"), by and through their counsel of record, hereby submit to this Honorable Court this stipulation and request to extend the time by **seven (7) days** for GEICO to file responses to Plaintiff's Motion for Protective Order against Defendant GEICO Choice Insurance Company's Notices to take Depositions of Jerome "Jerry" J. Konell, Sharithea Everett, and Willie Worthams [Doc. 91] (filed on December 11, 2024) and Plaintiff's Motion to Compel Responses to Specific FRCP 34 Request for Production and Disclosure of Documents Claimed Privileged from FRCP 26 Disclosures [Doc. 92] (filed on December 11, 2024). The current due date for GEICO's responses to both motions is December 26, 2025, the day after Christmas. The proposed new due date is January 2, 2025.

The parties respectfully submit that good cause exists for this stipulation based on the following:

1. Counsel for GEICO has pre-planned Holiday travel that overlaps with the current schedule of the brief. The requested extension accommodates the Holidays, as well as those travel plans.
2. The Parties have agreed to stipulate to this extension.
3. This request is made in good faith and without intent to cause undue delay.
4. In accordance with LR IA 6-1, this is the first request for an extension of time to file oppositions to Plaintiff's Motion for Protective Order against Defendant GEICO Choice Insurance Company's Notices to take Depositions of Jerome "Jerry" J. Konell, Sharithea Everett, and Willie Worthams [Doc. 91] and Plaintiff's Motion to Compel Responses to Specific FRCP 34 Request for Production and Disclosure of Documents Claimed Privileged from FRCP 26 Disclosures [Doc. 92].

Dated: December 18, 2024

By: /s/ Jonathan W. Carlson
 McCORMICK, BARSTOW, SHEPPARD,
 WAYTE & CARRUTH LLP
 Jonathan W. Carlson, Nevada Bar No. 10536
 Mandy Vogel, Nevada Bar No. 16150
 Attorneys for Defendant
 GEICO Choice Insurance Company

///

1 Dated: December 18, 2024

By: /s/ Jerome R. Bowen

2 BOWEN LAW OFFICES

Jerome R. Bowen, Nevada Bar No. 4540

3 Attorneys for Plaintiff Willie Worthams

4
5 IT IS SO ORDERED that the deadlines to file Responses to Plaintiff's Motion for Protective
6 Order against Defendant GEICO Choice Insurance Company's Notices to take Depositions of
7 Jerome "Jerry" J. Konell, Sharithea Everett, and Willie Worthams [Doc. 91] and Plaintiff's Motion
8 to Compel Responses to Specific FRCP 34 Request for Production and Disclosure of Documents
9 Claimed Privileged from FRCP 26 Disclosures [Doc. 92] are extended up to and including January
10 2, 2025.
11

12 December 19, 2024



13 UNITED STATES DISTRICT COURT JUDGE

14 10900188.1

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December, 2024, a true and correct copy of **STIPULATION TO EXTEND TIME TO FILE RESPONSES TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER [DOC. 91] AND MOTION TO COMPEL [DOC. 92] [FIRST REQUEST]** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Cheryl A. Schneider
Cheryl A. Schneider, an Employee of
McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP